

Judge Jamal N. Whitehead

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

## SHOALWATER BAY INDIAN TRIBE,

*Plaintiff,*

V.

EXXON MOBIL CORPORATION,  
EXXONMOBIL OIL CORPORATION, BP  
P.L.C., BP AMERICA INC., CHEVRON  
CORPORATION, CHEVRON USA, INC.,  
SHELL PLC, SHELL OIL COMPANY,  
CONOCOPHILLIPS, CONOCOPHILLIPS  
COMPANY, PHILLIPS 66, and PHILLIPS  
66 COMPANY,

### *Defendants.*

Case No. 2:24-cv-00158-JNW

**CORPORATE DISCLOSURE**  
**STATEMENT BY DEFENDANTS**  
**SHELL PLC AND SHELL USA, INC.**

Pursuant to Federal Rule of Civil Procedure 7.1 and Local Civil Rule 7.1, Defendants  
Shell plc (f/k/a Royal Dutch Shell plc) and Shell USA, Inc. (f/k/a Shell Oil Company) hereby  
make the following disclosures:

Shell plc is a publicly held company organized under the laws of the United Kingdom. Shell plc does not have any parent corporations, and no publicly traded company owns 10 percent or more of Shell plc's stock.

Shell USA, Inc. is a wholly owned subsidiary of Shell Petroleum Inc., whose ultimate corporate parent is Shell plc. No other publicly held company owns 10 percent or more of the stock of Shell USA, Inc.

This statement is filed solely for purposes of complying with Federal Rule of Civil Procedure 7.1 and Local Civil Rule 7.1, and in order that the Judges of this Court may determine the need for recusal. This statement is not intended to operate as an admission of any factual allegation or legal conclusion and is submitted subject to and without waiver of any right, defense, affirmative defense, or objection, including, but in no way limited to, venue, service, and personal jurisdiction.

DATED this 7th day of March, 2024.

K&L GATES LLP

By s/Kari L. Vander Stoep  
Kari L. Vander Stoep, WSB#35923  
925 Fourth Avenue, Suite 2900  
Seattle, WA 98104  
Phone: (206) 623-7580  
Fax: (206) 623-7022  
E-mail: [kari.vanderstoep@klgates.com](mailto:kari.vanderstoep@klgates.com)

David C. Frederick (*pro hac vice* forthcoming)  
James M. Webster, III (*pro hac vice* forthcoming)  
Daniel S. Severson (*pro hac vice* forthcoming)  
Daren G. Zhang (*pro hac vice* forthcoming)  
KELLOGG, HANSEN, TODD,  
FIGEL & FREDERICK, P.L.L.C.  
1615 M Street, N.W., Suite 400  
Washington, D.C. 20036  
Tel.: (202) 326-7900  
Fax: (202) 326-7999  
Email: dfrederick@kellogghansen.com  
Email: jwebster@kellogghansen.com  
Email: dseverson@kellogghansen.com  
Email: dzhang@kellogghansen.com

*Counsel for Shell plc and  
Shell USA, Inc. (f/k/a Shell Oil Company)*